REMARKS

We have amended claims 1 and 6 to more particularly point out and distinctly claim the invention. More specifically, we have amended claim 1 to make clear that it is the stored event and member information obtained from the respective databases that is compared to "identify for each member among the plurality of members all events among the plurality of events that match the stored member information for that member." We have amended claim 6 similarly.

Claims 1-6, 8, and 10-14 are pending in this application.

The Examiner again rejects claims 1-6, 8, and 10-14 under 35 U.S.C. §103(a) as being unpatentable over WO 01/52106 A2 by Gal et al. (a.k.a. Gal). The Examiner admits that "Gal fails to expressly disclose sending 'all of' the matching events/invitations in one e-mail to the user." But the Examiner argues that it would have been obvious to one of ordinary skill in the art to add this feature to Gal's system.

In view of our clarifying amendments to claims 1 and 6, we believe that Gal is missing more than what the Examiner has identified. Furthermore, we continue to submit that Gal teaches away from adding the feature which the Examiner admits to be missing from Gal.

In addition to the feature that the Examiner admits to be missing from Gal, Gal also fails to disclose:

> ...for each event of the plurality of events, comparing the stored event information obtained from the event information database for that event and the stored member information obtained from the member information database to identify for each member among the plurality of members all events among the plurality of events that match the stored member information for that member

as now required by claim 1, as amended.

The Examiner argues that Gal's "system uses profile information attached to message/invitation information for matching recipients to the message invitation." But as recited in the claim is now amended, it is the information that is obtained from the respective databases that is compared to identify the matches.

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The following excerpts describe how Gal uses the information contained in a received message to identify the appropriate recipients:

> The user creates a message and provides profile information of the recipients of the message. For example, if the profile information "photography" is provided, the message is sent to people whose hobby is photography. The message and the profile information is sent to server 26. The server 26 includes spam filtering software 28 which filters the messages. The profile information is used to search the database 30 to obtain a list of recipients. In this example, the message is provided to the recipient computers 32, 34, and 36. The message may be sent via E-mail or by using a dynamically created web page. (page 3, lines 8-15)
>
> If the spam filter okays the transformation of the message, the profile information is sent to the database checking program 52. This database checking program then produces a list of recipients. The list of recipients is provided, along with the message and user information, to a message broadcast software 54, and the message is then provided to the recipients (page 4, lines 4-8).

These passages make clear that Gal's system does not compare "for each event...stored event information obtained from the event information database for that event" with "stored member information obtained from the member information database" to generate its results. Rather, Gal's system functions basically as a filter between the senders of invitations and the recipients of those invitations. It processes each individual invitation separately upon receipt and on the fly to determine to whom that individual invitation should be sent.

Gal does identify various databases (see Fig. 4); however, his databases are not used in the manner required by the present claims. For example, in Fig. 4 Gal shows five tables. Three of the tables store information about individuals. These include the hobby table 92, the occupation table 94, and the name table 96. Table 98 stores information about the invitations that have been received. And table 100 stores the results of comparing the contents of an incoming message with the information found in tables 92, 95, and 96. In other words, table 100 is generated on the fly as messages are received. There is no instance in which information obtained from table 98 is compared to information obtained from any of the other tables to generate a results list.

As noted above, the Examiner admits that Gal's system does not perform the function of "generating and sending an electronic invitation message to the electronic mailbox of each

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member..., wherein each electronic invitation message invites its corresponding recipient to all of

the events for which matches were detected for that corresponding recipient." But he argues that:

> ...Gal does disclose combining event information by user/key number (pg. 5), and Gal also
> discloses electronically sending invitation information to users (pg.4).

> Therefore, it would have been obvious to one of ordinary skill in the art at the time the
> invitation was made to have included sending "all of" the matching events/invitations in one
> e-mail to the use[r] in the system disclosed by Gal, for the advantage of providing a method
> of invitation delivery with the ability to save system resources for both the user and the
> sender, by combining information sent.

As we have pointed out above, the parts of Gal's database 90 that store event information and

user/key numbers are tables 98 and 100. Table 98 lists invitations along with pointers to the

message block describing the event and Table 100 lists user/key numbers identifying the users and

for each user/key number, the invitations which apply to that user/key. These two tables are

provided as support for the dynamic creation of a web page when the user visits the web site.

In arguing that it would be obvious to use the information that is stored in these two tables to

generate emails that consolidate multiple invitations for each user, the Examiner is ignoring why

those tables are provided in the first place. More specifically, the Examiner is ignoring that these

features are part of an alternative embodiment designed to avoid sending email to users. Gal states:

> An alternative system using a dynamically created web page uses tables such as Tables 98
> and 100. Each invitation message created is associated with a pointer to the message block.
> ... Thus, when a user goes to the web page for the user's invitations, a web page is
> dynamically constructed by searching the database 90 for invitation corresponding to the
> user's key number. [emphasis added] (page 5, lines 15-20).

> The advantage of the message with the dynamically created web page rather than a
> traditional E-mail type message is that the messages are not considered as intrusive by the
> recipient since the recipient only needs to see the invitations when they go to the
> dynamically created web page. The messages don't clog up the recipient's work or hone E-
> mail system. [emphasis added] (page 6, lines 2-6).

Since Gal's alternative embodiment is for deployments in which email is to be avoided, why would

a person of ordinary skill in the art then use the information that is collected for that alternative

embodiment to generate emails? We submit that a person of ordinary skill in the art would not

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modify Gal's system in the way the Examiner has proposed. Moreover, since Gal has already provided an embodiment which employs an email notification mechanism (i.e., his first described embodiment) in which invitations are forwarded to users by email as those invitations arrive at the site, there is no motivation to modify the alternative embodiment to perform a function it was designed to avoid performing.

For at least the reasons stated above, we submit that it would not be obvious to modify Gal's system so that it sends an email that contains multiple invitations, as required by claim 1.

Claim 6, as amended, includes features that are similar to those discussed above in connection with claim 1.

For at least the reasons stated above, we believe that the claims are in condition for allowance and therefore ask the Examiner to allow them to issue.

Please apply any charges not covered, or any credits, to Deposit Account No. 08-0219, under Order No. 2000874.00146US1 from which the undersigned is authorized to draw.

Respectfully submitted,

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